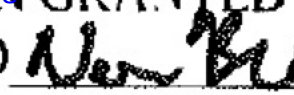


PEARL COHEN

Pearl Cohen Zedek L
Guy Yonay, Partner | GYonayAPPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 1/6/2023

January 5, 2023

VIA CM/ECFHonorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 518
New York, New York 10007

Defendant shall answer Plaintiff's complaint by February 6, 2023. As this is the third extension granted for this deadline, I do not anticipate granted further extensions.

RE: PowerBlock Holdings, Inc. v. Tzumi Electronics LLC, Case No. 1-22-cv-07296
Letter Motion Requesting Extension of Time to Answer

Dear Judge Broderick:

As counsel for Defendant Tzumi Electronics LLC in this matter, we are writing jointly with counsel for Plaintiff PowerBlock Holdings, Inc. to advise the Court that we have reached a settlement in principle in this matter. Accordingly, we are jointly requesting a 30-day stay of all deadlines in order to allow the parties time to negotiate a formal written settlement agreement.

Most imminently, we are requesting that Tzumi's time to answer or otherwise respond to the Complaint be extended by thirty (30) days, from today (January 5, 2023) up to and including February 6, 2023. There have been two previous extensions granted for this deadline. A prior extension for sixty (60) days was granted on September 22, 2022 and a previous extension for forty-five (45) days was granted on November 21, 2022. In view of the anticipated settlement of this matter, the parties do not expect there to be any further extensions requested.

Sincerely,



Guy Yonay